

June 12, 2018

Alfred M. Pollard, General Counsel
Attention: Comments/RIN 2590-AA83
Federal Housing Finance Agency
400 Seventh Street, SW, Eighth Floor
Washington, D.C. 20219

**Re: Notice of Proposed Rulemaking and Request for Comments –
RIN 2590-AA83 – Affordable Housing Program Amendments**

Mr. Pollard,

Thank you for the opportunity to comment on your recent release of proposed rulemaking regarding the Affordable Housing Program (“AHP”) of the Federal Home Loan Banks (FHLBanks). I am the Chief Operating Officer for LaCasa, Inc. in Goshen, Indiana and I have previously served on the Advisory Council for the FHLB in Indianapolis. LaCasa is a community development corporation with a long history of utilizing AHP funds to build multi-family affordable housing. We expect to submit two additional funding applications to our regional FHLB in the coming 12 months.

On behalf of LaCasa, Inc., please consider the following comments concerning the New Proposed Rule for the Affordable Housing Program (AHP).

- We believe the outcomes prioritization is an overly complicated process. We strongly encourage you to retain a scoring component as this helps ensure a simple, transparent approach to awarding funds. It allows projects to be placed in service in an orderly and predictable way. Other HUD and Treasury-based funds that are administered by the State Housing Authorities are exclusively awarded using a well-defined scoring process.
- We request that you allow the FHLBanks to utilize a modification as a cure solution as governed by its respective implementation plan rather than forcing a cure period before a modification. We believe this just delays the inevitable in resolving a non-compliance issue.
- All federal funds used for affordable housing require a retention period to assure the funds benefit the targeted population for a significant period of time. Removing such a lien restriction from the AHP program could encourage misuse of funds and predatory practices related to affordable housing. We support rules that assure the long-term use of funded properties specifically for affordable housing.
- We support the retention of monitoring and reporting of household income in the initial monitoring phase to assure compliance with the application. However, the relief of this monitoring and reporting during the long-term monitoring is welcomed and appreciated.

Thank you for opportunity to comment and for considering these suggestions.

Sincerely,



James N. Davis
Chief Operating Officer